

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

RESPONSES OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC. AND
VAL-PAK DEALERS' ASSOCIATION, INC.
(VP/USPS-T39-46-47, and 50)

The United States Postal Service hereby provides the responses of witness Kingsley to the following interrogatories of VAL-PAK Direct Marketing System, Inc. and VAL-PAK Dealers' Association, Inc.: VP/USPS-T39-46, 47 and 50, filed on October 24, 2001. Interrogatories VP/USPS-T39-48 and 49 were redirected to witness Schenk, and interrogatories VP/USPS-T39-39-45 were directed to the Postal Service and will be answered separately.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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November 7, 2001

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS KINGSLEY
TO INTERROGATORIES OF VAL-PAK DIRECT MARKETING SYSTEMS, INC.**

VP/USPS-T39-46

- a. Please refer to the response to VP/USPS-T39-15 and provide a responsive answer to part-a, which asks whether the AFSM 100 or the FSM 1000 could process untabbed "wraps" **assuming that those pieces were to have an address printed on them.** That is, are such pieces within the current handling capabilities of the AFSM 100 or the FSM 1000?
- b. When the Postal Service develops the ability to DPS flats, what will be benefit of having carrier-route presorted flats?

Response:

- (a) The previous response attempted to convey that the machinability of Enhanced Carrier Route untabbed "wraps" with addresses printed on them would be irrelevant since the AFSM 100s or FSM 1000s do not perform sorts below the carrier route level. If a mailer attempted to qualify these wraps for automation rates, the criteria for automation compatibility is spelled out in DMM C820 for both FSM 881 and FSM 1000 processing. The mail characteristics of the AFSM 100 are currently being finalized. Once completed, the FSM 881 criteria will be replaced with the AFSM 100 criteria in the DMM. In addition, I am unaware of any specific testing that has determined the extent to which these carrier-route sorted "wraps" would be automation compatible if moved to either FSM.
- (b) Refer to page 20 of my testimony.

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VP/USPS-T39-47

Please refer to your response to VP/USPS-T39-22.

- a. During the summer months, does the Postal Service eliminate casual and Part Time Flexible ("PTF") employees? If not, to what extent are their schedules (and costs) reduced?
- b. During the summer months, can the Postal Service reduce the hours of full-time employees who have not been employed by the Postal Service for six years, and who do not have job security guaranteed?
- c. During the summer months, can the Postal Service temporarily lay off full-time employees who have not been employed by the Postal Service for six years, and who do not have job security guaranteed?
- d. How much flexibility does the Postal Service have to adjust its work force to the "average week" operating plan for summer months, which usually exhibit a decline in mail volume?
- e. If a postal facility has more employees than its needs for, say two or three months, to what kinds of activities are those extra employees assigned?

Response:

- a. The casual and PTF schedules could be reduced all the way to zero if necessary.
However, the light volume period occurs in the summer, and the use of annual leave for summer vacations generally avoids any such necessity.
- b. No.
- c. Yes. However, the unions must be given 90 days notice, the affected individuals must be given 60 days notice, and civil service procedures must be followed for "preference eligible" employees.
- d. The Postal Service has sufficient flexibility to adjust staffing to workload.
- e. NA

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VP/USPS-T39-50

According to Handbook F-45, at page 12-10, the IOCS sampler is to identify the shape of a single piece of mail handled by the postal employee as Detached Address Card—Parent Piece Unidentifiable” if “the employee is handling a detached address card (see description below) without an accompanying parent piece, and it is not possible to identify the parent piece.” Emphasis in original. What are the activities a postal employee would be engaged in where that employee is handling a detached address card without the accompanying parent piece available for identification?

Response:

It is my understanding that IOCS has this option in case a detached card is found without an accompanying piece, regardless of what activity it occurs in. Potentially, it could occur in any activity in which a detached card is handled.

If this occurs, the employee would inform his supervisor of the situation and set the DAL aside until the accompanying parent piece is provided.

DECLARATION

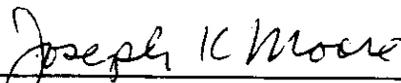
I, Linda A. Kingsley, declare under penalty of perjury that the foregoing answers are true and correct, to the best of my knowledge, information, and belief.

Linda A. Kingsley
LINDA A. KINGSLEY

Dated: 11/7/01

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



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